

WHIPPLE AZZARELLO, LLC

Attorneys at Law

177 Madison Avenue, 2nd Floor
Morristown, New Jersey 07960
Tel: (973) 267-7300
Fax: (973) 267-0031
whippleazzarellolaw.com

JOHN C. WHIPPLE
Certified by the Supreme Court of
New Jersey as a Criminal Trial Attorney

JOHN A. AZZARELLO
Admitted in New Jersey and New York

ADAM M. ELEWA
Admitted in New Jersey
and New York

ANTHONY M. GRUPPUSO
Of Counsel
Admitted in New Jersey and New York

February 25, 2025

VIA ECF

Hon. Christine P. O'Hearn, U.S.D.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Street
Camden, NJ 08101

Re: **United States v. Peter Coker, Jr.**
Docket No. 22-CR-643 (CPO)

Dear Judge O'Hearn:

Our Office represents Mr. Peter Coker, Jr. in the above-captioned matter. Mr. Coker, Jr. is currently detained at Essex County Correctional Facility ("ECCF"). As you are aware, Your Honor signed a court order on December 18, 2023, permitting Mr. Coker, Jr. "the maximum amount of time possible in the prison library per week through the conclusion of trial in this matter." *See* Dkt. No. 97: *Order Granting Mr. Coker, Jr. Expanded Library Privileges at Essex County Correctional Facility*. From on or about January 1, 2025 until the present, however, this Order is not being honored by the facility.

Mr. Coker, Jr.'s inability to access the library comes at a critical time in this matter. As Your Honor is aware, a loss hearing is scheduled for March 17, 2025 in which the total loss amount applicable under the U.S. Sentencing Guidelines will be determined, with the government and the defense taking adverse positions that result in an eight level difference in Mr. Coker, Jr.'s total offense level. Mr. Coker, Jr.'s total offense level under the U.S. Sentencing Guidelines may significantly impact the sentence imposed on him by the Court.

To date, we have attempted to remediate the issue with Mr. Coker, Jr.'s access to the library by repeatedly contacting the facility by telephone and email. The government has also attempted to remediate this issue by contacting the U.S. Marshalls Service, who in turn contacted officials at ECCF. The message from the facility on February 11, 2025, relayed through the government, was that several "lockdowns" have prohibited access to the library but that things would return to normal.

Unfortunately, although inmates are no longer in lockdown, Mr. Coker, Jr., is still being denied extended access to the library. Accordingly, we respectfully ask that Your Honor attempt to contact the facility through the U.S. Marshalls Service and impress upon them the necessity of permitting Mr. Coker, Jr. extended time in the library—especially given the upcoming loss

hearing that will likely be highly relevant to Mr. Coker, Jr.'s ultimate term of imprisonment in this matter. We believe that the facility hearing directly from Your Honor, albeit through the U.S. Marshalls Service, regarding why Mr. Coker, Jr.'s access to the library is so critical may finally remediate this issue.

Thank you for your attention to this matter.

Respectfully submitted,

WHIPPLE AZZARELLO, LLC

By: /s/ John A. Azzarello
John A. Azzarello

Cc: Lauren Repole, AUSA (by ECF).